1 MICHAEL C. ORMSBY United States Attorney FILED IN THE U.S. DISTRICT COURT EASTERN DISTRICT OF WASHINGTON Eastern District of Washington 3 Timothy J. Ohms AUG 17 2016 Assistant United States Attorney 4 SEAN F. McAVOY, CLERK Post Office Box 1494 SPOKANE, WASHINGTON 5 Spokane, WA 99210-1494 Telephone: (509) 353-2767 6 7 UNITED STATES DISTRICT 8 FOR THE EASTERN DISTRICT OF WASHINGTON 9 UNITED STATES OF AMERICA. 1:16-CR-2062-SMJ 10 11 Plaintiff, INDICTMENT 12 18 U.S.C. § 844(d), (j) VS. 13 Receipt of an Explosive in Interstate Commerce with Intent to Intimidate MELVIN THOMAS NEIFERT, 14 15 Defendant. 18 U.S.C. § 844 and 28 U.S.C. § 16 2461 Forfeiture Allegations 17 18 The Grand Jury Charges: 19 20 21 On or about between February 21, 2016, and May 1, 2016, in the Eastern 22 District of Washington, MELVIN THOMAS NEIFERT, did receive in interstate 23 and foreign commerce an explosive, to wit: potassium nitrate and other 24 components for an incendiary-explosive device consisting of a nitrate explosive 25 mixture with potassium nitrate and sugar, with the knowledge and intent that it 26 would be used to intimidate another person, in violation of 18 U.S.C. § 844(d), (j). 27

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1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 844 and 28 U.S.C. § 2461.

2. Pursuant to 18 U.S.C. § 844 (c)(1) and 28 U.S.C. § 2461(c), upon conviction the offense as alleged in the Indictment, Defendant MELVIN THOMAS NEIFERT shall forfeit to the United States of America, any explosive materials involved or used or intended to be used in the violation(s). The property to be forfeited includes, but is not limited to, stump remover seized on May 1, 2016, by the Federal Bureau of Investigation pursuant to a federal search warrant.

DATED this 16 day of August, 2016.

A TRUE BILL

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MICHAEL C. ORMSBY

United States Attorney

Timothy J. Ohms

Assistant United States Attorney